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June 25, 2008

VIA ECF

Honorable Robert P. Patterson, Jr.
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: Lawrence A. Kaplan v. Beth Israel Medical Center
Docket No.: 07 CV 8842 (RPP)(DFE)
Our File No.: 08986.00006

Dear Judge Patterson:

This firm represents defendant, Beth Israel Medical Center in the above captioned matter. We write to request an extension of time to complete discovery in this matter until October 15, 2008. Fact discovery is scheduled to be completed by August 31, 2008. This is the defendant's first such request and the plaintiff pro se consents to this request. Defendant makes this request because plaintiff pro se has advised that he will be out of the country from June 29, 2008 until August 24, 2008. Although some discovery has been exchanged between the parties, plaintiff's deposition will not go forward until his return from vacation on August 24, 2008. Accordingly, we propose that the scheduling order be amended as follows:

- Fact discovery completion date October 15, 2008.
- Proposed date for filing dispositive motions November 18, 2008.
- Proposed date for pre-trial order (in the event that no motion for summary judgment made) December 2, 2008.

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Thank you for your consideration of this request.

Respectfully Submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP



Shivani Soni

cc: Magistrate Judge Douglas F. Eaton (via ECF)
Daniel Patrick Moynihan
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